

1 S. FRANK HARRELL (SBN 133437)
2 sharrell@lynberg.com
3 JESSE K. COX (SBN 285218)
4 jcox@lynberg.com
5 DELANEY N. KENNEDY (SBN 345397)
6 dkennedy@lynberg.com
7 **LYNBERG & WATKINS**
8 A Professional Corporation
9 1100 W. Town & Country Road, Suite #1450
10 Orange, California 92868
11 (714) 937-1010 Telephone
12 (714) 937-1003 Facsimile

13 Attorneys for Defendant COUNTY OF ORANGE

14
15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 SYED RAZA HUSSAIN,

18 Plaintiff,

19 vs.

20 COUNTY OF ORANGE, a
21 governmental entity; LAURIE
22 SCHWARTZ, individually, DOES 1-
23 10, individually,

24 Defendants.

25 CASE NO. 8:22-cv-02100 DOC (KESx)

26 *Assigned to: Hon. David O. Carter –
27 Courtroom 10A*

28 **NOTICE OF SETTLEMENT**

Complaint filed: November 17, 2022

First Amended Complaint filed: May 6,
2024

Trial Date: February 18, 2025

1 **TO THE HONORABLE COURT:**

2 Plaintiff SYED RAZA HUSSAIN and Defendants COUNTY OF ORANGE
3 and LAURIE SCHWARTZ, by and through their respective counsel of record,
4 hereby provide notice to the Court, consistent with Local Rules 16-15.7 and 40.2,
5 that the parties have conditionally settled this matter with respect to all claims for
6 relief, inclusive of attorney's fees, costs, and liens. The settlement is contingent
7 upon review and approval by the Orange County Board of Supervisors. At present,
8 the parties are working on a Settlement Agreement and General Release
9 ("Agreement"). If settlement is approved, the parties will execute the Agreement
10 and arrange for disbursement of settlement funds. Once the settlement funds are
11 received by Plaintiffs' counsel, the parties will file a Rule 41 Stipulation for
12 Dismissal with Prejudice.

13 In light of the foregoing, the parties jointly request that all upcoming court
14 dates in this matter be vacated, including the parties' Final Pretrial Conference and
15 trial date.

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 So as to permit the parties sufficient time to allow this matter to be considered
2 by the Orange County Board of Supervisors and, if approved, to consummate the
3 settlement, the parties further request that the Court set a Status Conference and/or
4 Order to Show Case re Dismissal/Settlement approximately 90 days from today's
5 date to assess any need for the Court's jurisdiction over this matter.

6 DATED: August 15, 2024

Respectfully submitted,

7 **LYNBERG & WATKINS**

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

By: */s/ Jesse K. Cox¹*

S. FRANK HARRELL

JESSE K. COX

DELANEY N. KENNEDY

Attorneys for Defendant

COUNTY OF ORANGE

DATED: August 15, 2024

COLLINS + COLLINS

By: */s/ Michael L. Wroniak*

MICHAEL L. WRONIAK

Attorneys for Defendant

LAURIE SCHWARTZ

DATED: August 15, 2024

THE SEHAT LAW FIRM

By: */s/ Cameron Sehat*

CAMERON SEHAT

Attorneys for Plaintiff

SYED RAZA HUSSAIN

¹ Pursuant to California Central District Local Rule 5-4.3.4, all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.